

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs

LARRY CHARLES INMAN,

Defendant.

Case No. 1:19-cr-117

Hon. Robert J. Jonker

Hon. Phillip J. Green

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**RESPONSE RE: GOVERNMENT'S MOTION IN LIMINE TO ADMIT
SUMMARY CHARTS OF TEXT MESSAGES**

Now comes Defendant Larry Charles Inman by and through his attorneys of record,
NEUMANN LAW GROUP, and in response to the Government's Admit Summary Charts of Text
Messages states as follows:

Defendant Larry Charles Inman does not have an objection to the use of some easier to
read format for admitting certain text messages to make them more legible for the jury.
However, it is difficult to stipulate or agree to the Government's proposed format without
some foundation from the Government's expert witness who extracted the information from

the defendant's phone and prepared the "Extraction Report" that is the basis for the summaries. For example, the printout for the Extraction Report contains additional information that is not contained in the summary charts proposed by the Government. An example is below:

Sent	To 12316701669 Thomaswillson *	6/3/2018 15:09(UTC+0)			Sent	Hi Tom, I am just getting into the shower, can you met for breakfast at the cottage , I will bring your picture, Larry	Intact
	Direction: Outgoing					Source Extraction: Logical (1), Logical (2)	

There is information in the forensic report such as "Sent" and "Read" for each message. What does this mean in the context of the message being read by the intended recipient? There is a notation called "Intact". What does this mean? How is it relevant to the transmission or receipt of the message. The time for the transmission is in "UTC" time. What is the conversion of this time into Eastern time?

For the text message to be a "quid" for a "pro quo" it would have to be read by the recipient. Further, it is the position of the defendant that the message must be read prior to the vote being taken on the house floor. Since the "quid" must have a direct relation to the "pro quo" if it is received after the vote is taken, it cannot be logically connected to the official action.

Finally, the defendant objects to general text messages that address issues of requests for legal campaign contributions or that generally discuss fund raising, ie: invitations to fund raising events where a request is made to "bring a check" or "bring checks". Fundraising is a

necessary and legal part of our political process. To allow any test message into evidence that does not request a specific campaign contribution for a specific official act, ie: a specific vote, would infringe on the defendants First Amendment rights to cast his vote as he chooses (Please see defendant's Trial Brief filed contemporaneously with this response.

November 10, 2019

Respectfully,

A handwritten signature in black ink, appearing to read "C. K. Cooke", written over a horizontal line.

Christopher K. Cooke (P35034)
NEUMANN LAW GROUP